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March 28, 2022

***VIA ECF***

Hon. Joanna Seybert  
United States District Judge  
Eastern District of New York  
Alfonse M. D'Amato Federal Building  
United States District Court  
100 Federal Plaza, Courtroom 1030  
Central Islip, New York 11722

***Re: Weingot, et al v. Unison Agreement Corp., et al.***  
**Case No. 2:21-cv-04542-JS-AYS**

Dear Honorable Judge Seybert:

As you are aware, this firm represents Defendants Unison Agreement Corp., Real Estate Equity Exchange Inc. and Odin New Horizon Real Estate Fund LP (“Defendants”) in the above-referenced action filed by Yisroel and Suri Weingot (“Plaintiffs”).

On December 16, 2021, the Court held a pre-motion conference and subsequently issued an order [ECF No. 15] referring the parties to mediation to be concluded by February 14, 2022. Pursuant to your honor’s order, the parties scheduled a mediation before Joseph DiBenedetto for February 8, 2022. However, due to serious complications stemming from COVID-19, counsel for Plaintiffs was unable to attend the mediation. As such, Plaintiffs filed a letter motion requesting an extension of time to conclude the mediation [ECF No. 18], which the Court granted and extended the mediation completion deadline to March 31, 2022. Soon after, the parties rescheduled their mediation for March 28, 2022, before Mr. DiBenedetto.

On March 27, 2022, Mr. DiBenedetto informed the parties that due to a recent illness he is unable to proceed with the mediation scheduled for March 28, 2022. Mr. DiBenedetto proposed dates to reschedule the mediation, all of which occur after the Court’s mediation completion deadline. The parties have now agreed to reschedule the mediation to April 27, 2022.

We therefore respectfully ask for an extension of time to complete the mediation to a date after April 27, 2022. We thank the Court for its consideration of this request.

Respectfully,

/s/ Alexander J. Gershen

Alexander J. Gershen

Scale LLP

Attorney for Defendants Unison Agreement Corp.,  
Real Estate Equity Exchange Inc., and Odin New  
Horizon Real Estate Fund L.P.

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